

1  
2  
3  
4  
5  
6 **UNITED STATES DISTRICT COURT**  
7 **WESTERN DISTRICT OF WASHINGTON**  
8 **AT SEATTLE**

9 FEDERAL TRADE COMMISSION, *et al.*,

10 Plaintiffs,

11 v.

12 AMAZON.COM, INC., a corporation,

13 Defendant.

CASE NO.: 2:23-cv-01495-JHC

STIPULATED MOTION AND  
ORDER EXTENDING DEADLINES

14  
15 The Court's October 18, 2024 Order Extending Interim Deadlines (Dkt. #310) provides  
16 that the deadline for Plaintiffs to file a motion regarding any disputes regarding search is October  
17 30, 2024, and that the parties will file a joint submission on proposed deadlines for any Second  
18 Set of documents by November 4, 2024.

19 The parties have continued to meet and confer regarding search issues. The parties agree  
20 that a brief extension of the above-referenced deadlines may allow the parties to further narrow  
21 their disputes and reduce the number of issues that will require court intervention. Accordingly,  
22 the parties, by and through their respective attorneys of record, hereby stipulate and agree to the  
23 following deadlines:

1           1.       The deadline for Plaintiffs to file a motion regarding any disputes regarding  
2                   search, including custodians or search terms, shall be November 5, 2024.

3           a.       This deadline does not apply to any disputes regarding non-custodial  
4                   sources or Amazon’s proposed “spam” protocol for custodians Andy Jassy  
5                   and Jeff Bezos. Any motions regarding those issues are due no later than  
6                   November 14, 2024. (Dkt. #319).

7           b.       The Court’s Order regarding sealing issues shall apply separately to any  
8                   discovery motions, including oppositions or replies related to such  
9                   motions, filed on or before November 5, 2024, and to any discovery  
10                  motions, including oppositions or replies related to such motions, filed on  
11                  or before November 14, 2024. (Dkt. #320).

12          2.       The deadline for a joint submission on proposed deadlines for any Second Set of  
13                   documents shall be November 12, 2024.

1 Stipulated to and respectfully submitted this 28th day of October, 2024, by:

2 *s/ Michael Baker*

3 SUSAN A. MUSSER (DC Bar # 1531486)

4 EDWARD H. TAKASHIMA (DC Bar # 1001641)

5 MICHAEL BAKER (DC Bar # 1044327)

6 Federal Trade Commission

7 600 Pennsylvania Avenue, NW

8 Washington, DC 20580

9 Tel.: (202) 326-2122 (Musser)

(202) 326-2464 (Takashima)

10 Email: smusser@ftc.gov

11 etakashima@ftc.gov

12 mbaker1@ftc.gov

13 *Attorneys for Plaintiff Federal Trade Commission*

s/ Michael Jo

Michael Jo (admitted *pro hac vice*)  
Assistant Attorney General, Antitrust Bureau  
New York State Office of the Attorney  
General  
28 Liberty Street  
New York, NY 10005  
Telephone: (212) 416-6537  
Email: Michael.Jo@ag.ny.gov  
*Counsel for Plaintiff State of New York*

s/ Rahul A. Darwar

Rahul A. Darwar (admitted *pro hac vice*)  
Assistant Attorney General  
Office of the Attorney General of Connecticut  
165 Capitol Avenue  
Hartford, CT 06016  
Telephone: (860) 808-5030  
Email: Rahul.Darwar@ct.gov  
*Counsel for Plaintiff State of Connecticut*

s/ Alexandra C. Sosnowski

Alexandra C. Sosnowski (admitted *pro hac vice*)  
Assistant Attorney General  
Consumer Protection and Antitrust Bureau  
New Hampshire Department of Justice  
Office of the Attorney General  
One Granite Place South  
Concord, NH 03301  
Telephone: (603) 271-2678  
Email: Alexandra.c.sosnowski@doj.nh.gov  
*Counsel for Plaintiff State of New Hampshire*

s/ Robert J. Carlson

Robert J. Carlson (admitted *pro hac vice*)  
Assistant Attorney General  
Consumer Protection Unit  
Office of the Oklahoma Attorney General  
15 West 6th Street, Suite 1000  
Tulsa, OK 74119  
Telephone: (918) 581-2885  
Email: robert.carlson@oag.ok.gov  
*Counsel for Plaintiff State of Oklahoma*

s/ Timothy D. Smith

Timothy D. Smith, WSBA No. 44583  
Senior Assistant Attorney General  
Antitrust and False Claims Unit  
Oregon Department of Justice  
100 SW Market St  
Portland, OR 97201  
Telephone: (503) 934-4400  
Email: tim.smith@doj.state.or.us  
*Counsel for Plaintiff State of Oregon*

s/ Jennifer A. Thomson

Jennifer A. Thomson (admitted *pro hac vice*)  
Senior Deputy Attorney General  
Pennsylvania Office of Attorney General  
Strawberry Square, 14th Floor  
Harrisburg, PA 17120  
Telephone: (717) 787-4530  
Email: jthomson@attorneygeneral.gov  
*Counsel for Plaintiff Commonwealth of Pennsylvania*

s/ Michael A. Undorf

Michael A. Undorf (admitted *pro hac vice*)  
Deputy Attorney General  
Delaware Department of Justice  
820 N. French St., 5th Floor  
Wilmington, DE 19801  
Telephone: (302) 683-8816  
Email: michael.undorf@delaware.gov  
*Counsel for Plaintiff State of Delaware*

s/ Christina M. Moylan

Christina M. Moylan (admitted *pro hac vice*)  
Assistant Attorney General  
Chief, Consumer Protection Division  
Office of the Maine Attorney General  
6 State House Station  
Augusta, ME 04333-0006  
Telephone: (207) 626-8800  
Email: christina.moylan@maine.gov  
*Counsel for Plaintiff State of Maine*

s/ Gary Honick

Gary Honick (admitted *pro hac vice*)  
 Assistant Attorney General  
 Deputy Chief, Antitrust Division  
 Office of the Maryland Attorney General  
 200 St. Paul Place  
 Baltimore, MD 21202  
 Telephone: (410) 576-6470  
 Email: Ghonick@oag.state.md.us  
*Counsel for Plaintiff State of Maryland*

s/ Katherine W. Krems

Katherine W. Krems (admitted *pro hac vice*)  
 Assistant Attorney General, Antitrust Division  
 Office of the Massachusetts Attorney General  
 One Ashburton Place, 18th Floor  
 Boston, MA 02108  
 Telephone: (617) 963-2189  
 Email: katherine.krems@mass.gov  
*Counsel for Plaintiff Commonwealth of Massachusetts*

s/ Scott A. Mertens

Scott A. Mertens (admitted *pro hac vice*)  
 Assistant Attorney General  
 Michigan Department of Attorney General  
 525 West Ottawa Street  
 Lansing, MI 48933  
 Telephone: (517) 335-7622  
 Email: MertensS@michigan.gov  
*Counsel for Plaintiff State of Michigan*

s/ Zach Biesanz

Zach Biesanz (admitted *pro hac vice*)  
 Senior Enforcement Counsel  
 Office of the Minnesota Attorney General  
 445 Minnesota Street, Suite 1400  
 Saint Paul, MN 55101  
 Telephone: (651) 757-1257  
 Email: zach.biesanz@ag.state.mn.us  
*Counsel for Plaintiff State of Minnesota*

s/ Lucas J. Tucker

Lucas J. Tucker (admitted *pro hac vice*)  
 Senior Deputy Attorney General  
 Office of the Nevada Attorney General  
 100 N. Carson St.  
 Carson City, NV 89701  
 Telephone: (775) 684-1100  
 Email: LTucker@ag.nv.gov  
*Counsel for Plaintiff State of Nevada*

s/ Andrew Esoldi

Andrew Esoldi (admitted *pro hac vice*)  
 Deputy Attorney General  
 New Jersey Office of the Attorney General  
 124 Halsey Street, 5th Floor  
 Newark, NJ 07101  
 Telephone: (973) 648-7819  
 Email: andrew.esoldi@law.njoag.gov  
*Counsel for Plaintiff State of New Jersey*

s/ Jeffrey Herrera

Jeffrey Herrera (admitted *pro hac vice*)  
 Assistant Attorney General  
 New Mexico Office of the Attorney General  
 408 Galisteo St.  
 Santa Fe, NM 87501  
 Telephone: (505) 490-4878  
 Email: jherrera@nmag.gov  
*Counsel for Plaintiff State of New Mexico*

s/ Zulma Carrasquillo Almena

Zulma Carrasquillo Almena (admitted *pro hac vice*)  
 Puerto Rico Department of Justice  
 P.O. Box 9020192  
 San Juan, Puerto Rico 00902-0192  
 Telephone: (787) 721-2900, Ext. 1211  
 Email: zcarrasquillo@justicia.pr.gov  
*Counsel for Plaintiff Commonwealth of Puerto Rico*

1 s/ Stephen N. Provazza

Stephen N. Provazza (admitted *pro hac vice*)  
2 Special Assistant Attorney General  
Chief, Consumer and Economic Justice Unit  
3 Department of the Attorney General  
150 South Main Street  
4 Providence, RI 02903  
Telephone: (401) 274-4400  
5 Email: sprovazza@riag.ri.gov  
*Counsel for Plaintiff State of Rhode Island*

6 s/ Sarah L.J. Aceves

7 Sarah L.J. Aceves (admitted *pro hac vice*)  
Assistant Attorney General  
8 Public Protection Division  
Vermont Attorney General's Office  
9 109 State Street  
Montpelier, VT 05609  
10 Telephone: (802) 828-3170  
Email: Sarah.Aceves@vermont.gov  
11 *Counsel for Plaintiff State of Vermont*

12 s/ Laura E. McFarlane

Laura E. McFarlane (admitted *pro hac vice*)  
13 Assistant Attorney General  
Wisconsin Department of Justice  
14 Post Office Box 7857  
Madison, WI 53707-7857  
15 Telephone: (608) 266-8911  
Email: mcfarlanele@doj.state.wi.us  
16 *Counsel for Plaintiff State of Wisconsin*

**MORGAN, LEWIS & BOCKIUS LLP**

By: s/ Patty A. Eakes

Patty A. Eakes, WSBA #18888

Molly A. Terwilliger, WSBA #28449

1301 Second Avenue, Suite 2800

Seattle, WA 98101

Phone: (206) 274-6400

Email: patti.eakes@morganlewis.com

molly.terwilliger@morganlewis.com

**WILLIAMS & CONNOLLY LLP**

Heidi K. Hubbard (*pro hac vice*)

John E. Schmidlein (*pro hac vice*)

Kevin M. Hodges (*pro hac vice*)

Jonathan B. Pitt (*pro hac vice*)

Carl R. Metz (*pro hac vice*)

Carol J. Pruski (*pro hac vice*)

Katherine Trefz (*pro hac vice*)

680 Maine Avenue SW

Washington, DC 20024

Phone: (202) 434-5000

Email: hhubbard@wc.com

khodges@wc.com

jpitt@wc.com

cmetz@wc.com

cpruski@wc.com

ktrefz@wc.com

**COVINGTON & BURLING LLP**

Thomas O. Barnett (*pro hac vice*)

Katherine Mitchell-Tombras (*pro hac vice*)

One CityCenter

850 Tenth Street, NW

Washington, DC 20001-4956

Phone: (202) 662-5407

Email: tbarnett@cov.com

kmitchelltombras@cov.com

**WILKINSON STEKLOFF LLP**

Kosta S. Stojilkovic (*pro hac vice*)  
2001 M Street NW, 10th Floor  
Washington, DC 20036  
Phone: (202) 847-4045  
Email: [kstojilkovic@wilkinsonstekloff.com](mailto:kstojilkovic@wilkinsonstekloff.com)

*Attorneys for Defendant Amazon.com, Inc.*



**ORDER**

IT IS SO ORDERED.

DATED this 28<sup>th</sup> day of October, 2024.



JOHN H. CHUN

UNITED STATES DISTRICT JUDGE